

EXHIBIT 24

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 Case No. 7:17-cv-08943

4 - - - - -x
5 NATIONAL ASSOCIATION FOR THE
6 ADVANCEMENT OF COLORED PEOPLE, SPRING
7 VALLEY BRANCH; JULIO CLERVEAUX; CHEVON
8 DOS REIS; ERIC GOODWIN; JOSE VITELIO
9 GREGORIO; DOROTHY MILLER; HILLARY
10 MOREAU; and WASHINGTON SANCHEZ,

11 Plaintiffs,

12 -against-

13 EAST RAMAPO CENTRAL SCHOOL DISTRICT and
14 MARYELLEN ELIA, IN HER CAPACITY AS THE
15 COMMISSIONER OF EDUCATION OF THE STATE
16 OF NEW YORK,

17 Defendants.

18 - - - - -x

19 November 9, 2018
20 10:00 a.m.

21 Deposition of Plaintiff, JOSE VITELIO
22 GREGORIO, taken by attorneys for Defendant East
23 Ramapo Central School District, pursuant to
24 notice, held at the offices of Morgan Lewis &
25 Bockius LLP, 101 Park Avenue, New York, New
York, before Helen Mitchell, a Registered
Professional Reporter and Notary Public.

1 S A G R A R I O M E L O
2 was duly sworn by the Notary Public (Helen
3 Mitchell), to faithfully and accurately
4 translate the proceedings between English and
5 Spanish as required.

6 J O S E V I T E L I O G R E G O R I O,
7 having been first duly sworn through the
8 interpreter, was examined and testified as
9 follows:

10 EXAMINATION

11 BY MS. KOLLM:

12 Q Good morning, Mr. Gregorio.

13 My name is Clara Kollm, and I
14 represent the East Ramapo Central School
15 District in this case.

16 Will you please state your full
17 name for the record.

18 A Jose Vitelio Gregorio.

19 Q Mr. Gregorio, I understand that
20 you speak English and Spanish. Is that right?

21 A Yes.

22 Q For the record, we have an
23 interpreter here with you today, who speaks
24 Spanish and will be translating my questions.

25 A Correct.

1 I don't have access to see the budget, but I
2 don't know how the budget is distributed. I
3 don't have access to see how the budget is
4 distributed, but I believe that we can have
5 something better.

6 I don't know if I answer what
7 you wanted to hear.

8 Q Isn't it true that the budget
9 is discussed at Board of Education meetings?

10 MR. JOHNSON: Objection.

11 A Yes, but I don't understand how
12 a budget can be distributed. I don't understand
13 that.

14 Q Is this lawsuit about the
15 quality of education in the district?

16 MR. JOHNSON: Objection.

17 A Specifically, in my own words,
18 yes, we are looking for a better quality
19 education for our children.

20 Q Without revealing any
21 communications you may or may not have had with
22 your attorneys, how did you come to be a named
23 plaintiff in this litigation?

24 MR. JOHNSON: Before the
25 witness answers, I would like to remind

1 BY MS. KOLLM:

2 Q When I refer to the word
3 "slate," I'm not referring to an official
4 organization, I am also referring to informal
5 associations.

6 A That I don't know.

7 Q Do you consider race when
8 deciding for whom to cast a vote for school
9 board?

10 A Not necessarily.

11 Q Do you consider religion when
12 deciding for whom to cast a vote for in a school
13 board election?

14 A No.

15 Q Can you please look at numbered
16 paragraph six of your declaration.

17 Does paragraph six require any
18 clarification?

19 A Yes. It will be the last
20 eleven years.

21 Q Would you agree that there is
22 approximately one school board election each
23 year?

24 A Can you repeat the question
25 again?

1 A Okay, that's fine.

2 Q So with that understanding,
3 does paragraph seven require any clarification?

4 A No. No, it doesn't need any
5 change.

6 Q Thank you.

7 Have you ever been prevented
8 from casting a vote in a school board election
9 for your chosen candidate?

10 A No.

11 Q To the best of your knowledge,
12 what voting system does the district employ to
13 elect school board members?

14 A No, I don't know the system.

15 Q Do you know what an at-large
16 voting system is?

17 A I only understand that they
18 count the ballots; the one that has the more
19 ballots, he wins/she wins. That's all I
20 understand as the system.

21 Q Is that what you understand the
22 system in the district to be?

23 A Yeah, that's the way it is up
24 until now, that's what I understand now.

25 Q Do you know what a ward voting

1 Q Do you remember if there were
2 any Latino or Hispanic candidates in the 2015
3 school board election?

4 A Yes, there was a
5 Hispanic/Puerto Rican descent, but I don't
6 remember exactly if it was 2015.

7 Q Are you referring to Juan Pablo
8 Ramirez?

9 A Yes.

10 Q Did you support Mr. Ramirez's
11 candidacy?

12 A Yes.

13 Q And he was elected to the
14 board; right?

15 A No, I don't remember if he was
16 elected.

17 Q Why did you support
18 Mr. Ramirez's candidacy?

19 A I'm going to be direct. For
20 being Hispanic, thinking that he was going to
21 help us.

22 Q Is it fair to say that
23 Mr. Ramirez received support from the Latino and
24 Hispanic community?

25 MR. JOHNSON: Objection.

1 A Yes.

2 Q Do you know if Mr. Ramirez
3 received support from the black community?

4 MR. JOHNSON: Objection.

5 A I don't know. I don't know
6 that.

7 Q Did you vote in the 2014 school
8 board election?

9 A To be honest, I don't remember
10 if I voted that year.

11 Q Did you vote in the 2013 school
12 board election?

13 A Yes.

14 Q Do you remember for whom you
15 voted?

16 A No. I don't remember, no.

17 Q Do you remember if there were
18 any Hispanic or Latino candidates running for
19 the board in 2013?

20 A I don't remember if it was that
21 year, a Mr. Ivan Rivera. I don't remember if it
22 was that year.

23 Q Do you remember if he was
24 elected?

25 A No, he was not elected.

C E R T I F I C A T E

I, HELEN MITCHELL, a Registered
Professional Reporter and Notary Public, do
hereby certify:

I reported the proceedings in the
within-entitled matter, and that the within
transcript is a true record of such proceedings.

I further certify that I am not related, by
blood or marriage, to any of the parties in this
matter and that I am in no way interested in the
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 14th day of November, 2018.



HELEN MITCHELL, RPR

November 9, 2018

I N D E X

WITNESS	EXAMINATION BY	PAGE
JOSE GREGORIO	Ms. Kollm	3

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